

**UNITED STATES DISTRICT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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JPMORGAN CHASE BANK, NATIONAL  
ASSOCIATION

Plaintiff,  
v

JOHN W. HIGGINS, MARTHA R. HIGGINS; and  
UNITED STATES OF AMERICA,

Defendants.

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UNITED STATES OF AMERICA,

Counterclaim/Crossclaim Plaintiff,

v

JOHN W. HIGGINS, MARTHA R. HIGGINS;

Crossclaim Defendants,

and

JPMORGAN CHASE BANK, N.A.,

Counterclaim Defendant.

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**PLAINTIFF JPMORGAN CHASE BANK, N.A.'S CONCURRENCE WITH THE  
UNITED STATES OF AMERICA'S MOTION FOR SUMMARY JUDGMENT AND  
NOTICE OF SETTLEMENT AGREEMENT**

For the reasons set forth in the United States of America's motion for summary judgment and brief in support, (RE 83, 84), as well as its Notice of Attached Settlement Agreement between the United States of America and Plaintiff JPMorgan Chase Bank, N.A. ("Chase") (RE 81, 81-1), Chase hereby confirms its concurrence in the relief sought by the United States of America, consistent with the terms of the settlement agreement. (RE 81-1.) Chase denies as untrue the unfounded assertions of Defendants John and Martha Higgins with respect to Chase in their response to the United States of America's motion for summary judgment. (See RE 86, PageID # 489, 490, 491, 492.)

Dated: September 24, 2024

Respectfully submitted,

/s/ Mark J. Magyar  
Mark J. Magyar (P75090)  
DYKEMA GOSSETT PLLC  
Attorneys for Plaintiff JPMorgan Chase  
Bank, N.A.

**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all registered recipients, and a copy of the foregoing was sent to Defendants John W. and Martha R. Higgins by U.S. Mail to 50102 Alpine Blvd., New Buffalo MI 49117.

/s/ Mark J. Magyar (P75090)